

Plaintiff's Notice of Acceptance of Defendants'  
Offer of Judgment Pursuant to FRCP 68

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**Exhibit A**

THE HONORABLE RICARDO S. MARTINEZ

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

SEDRICK DEWAYNE ALTHEIMER,

Plaintiff,

vs.

PIERCE COUNTY, WASHINGTON, and  
PIERCE COUNTY SHERIFF EDWARD C.  
TROYER, (a/k/a Ed Troyer), in his individual  
and official capacity,

Defendants.

NO. 2:21-cv-01437-RSM

OFFER OF JUDGMENT PURSUANT TO  
RULE 68

Pursuant to Federal Rule of Civil Procedure 68 and *Marek v. Chesny*, 473 U.S. 1 (1985), Defendants Pierce County and Edward C. Troyer hereby offer to permit Plaintiff to take a judgment against them in settlement of all claims against all Defendants to this action, including but not limited to Defendants Pierce County and Edward C. Troyer, in the amount of Five Hundred Thousand and Fifteen Dollars (\$500,015.00) plus reasonable attorney's fees and costs as determined by the Court.

This Offer is extended in an effort to settle and fully resolve all legal and equitable relief sought by Plaintiff in this case against Defendants, to include any current or former employees of Pierce County. This Offer is made for the purpose of and pursuant to Federal Rule of Civil

1 Procedure 68 and shall not be construed as a waiver of any defense or objection, as an admission  
2 of liability, or as an admission that Plaintiff has suffered any injury or incurred any damages as a  
3 result of any action, inaction, or other conduct by Defendants. This Offer is made in an attempt to  
4 allow Plaintiff and Defendants to compromise their respective litigation positions, to eliminate the  
5 added costs of further discovery and other trial preparation, and to avoid the risks and expenses of  
6 trial.

7 DATED this 25<sup>th</sup> day of October, 2023.

8 By: s/ Gregory E. Jackson  
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13 By: s/ L. Clay Selby  
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*Attorney for Defendant Edward C. Troyer*

**CERTIFICATE OF SERVICE**

I certify that I served on all parties or their counsel of record a copy of this document addressed as follows:

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Attorney for Defendant Pierce County  
Sheriff Edward C. Troyer

DATED this 25<sup>th</sup> day of October, 2023, at Renton, Washington.

/s/ Jenny Singleton

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